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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JENNIFER KWASNIEWSKI, individually and
as Special Administrator of the ESTATE OF
ANDREW A. KWASNIEWSKI; TAYLOR L.
KWASNIEWSKI; and DYLAN A.
KWASNIEWSKI, a minor, by and through
Jennifer Kwasniewski, his mother and guardian,

Plaintiffs,

vs.

SANOFI-AVENTIS U.S. LLC, a Delaware
limited liability company; DOES I through X,
inclusive; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

Case No. 2:12-cv-00515-GMN-CWH

**STIPULATION FOR EXTENSION OF
TIME TO FILE PLAINTIFFS' RESPONSE
TO DEFENDANTS MOTION FOR
PROTECTIVE ORDER /DOCKET 226/**

/First Request/

IT IS HEREBY STIPULATED by and between Plaintiffs Jennifer Kwasniewski,
individually and as Special Administrator of the Estate Of Andrew A. Kwasniewski; Taylor L.
Kwasniewski; and Dylan A. Kwasniewski, a minor, by and through Jennifer Kwasniewski, his
mother and guardian, by and through their attorneys of record Murdock & Associates, Chtd. and

1 Eckley M. Keach, Chtd., and Defendant SANOFI-AVENTIS U.S. LLC, by and through its
2 attorneys of record Morris Law Group and Shook, Hardy & Bacon, LLP, that Plaintiffs shall have
3 until Friday, September 8, 2017, to file their Response to Defendant Sanofi-Aventis, U.S., LLC's
4 Motion for Protective Order (Docket 226). Currently, Plaintiffs' Response is due on August 28,
5 2017. The reason for the requested extension is that Counsel for Plaintiffs (Mr. Murdock) was out
6 of town from 8/14/17 through 8/18/17 taking FRCP 30(B)6 depositions in New Jersey, and will be
7 out of town from 8/21/17 through 8/28/17 (taking son to College at Columbia University in New
8 York). He also will be out of town in Cleveland, Ohio from 9/1/17 through 9/4/17 attending a
9 wedding. This is the First Request for an extension.
10
11

12 IT IS SO STIPULATED.

13 Dated this 21st day of August, 2017.

14 MURDOCK & ASSOCIATES, CHTD.
15 ECKLEY M. KEACH, CHTD.

16 /s/ Robert E. Murdock
17 Robert E. Murdock, Esq.
18 Eckley M. Keach, Esq.
19 521 S. Third Street
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21 *Attorneys for Plaintiffs*

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Attorney for Defendant Sanofi-Aventis US, LLC

24 **ORDER**

25
26 IT IS SO ORDERED this _ August 22 _____, 2017.

27
28 
UNITED STATES MAGISTRATE JUDGE